

**STATE OF SOUTH CAROLINA BEFORE THE
PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-88-E**

IN RE:)
)
Dominion Energy South Carolina, Inc.'s)
2021 Avoided Cost Proceeding Pursuant to)
S.C. Code Ann. Section 58-41-20(A))
_____)

**CAROLINAS CLEAN ENERGY
BUSINESS ASSOCIATION'S FIRST
SET OF INTERROGATORIES TO
LONDON ECONOMICS
INTERNATIONAL, LLC**

Please note, the Carolinas Clean Energy Business Association ("CCEBA"), has, prior to this Discovery submittal, filed a Motion with this Commission to reduce the response time for this Discovery Request to nine (9) days, for good cause shown in CCEBA's Motion.

Pursuant to S.C. Code Ann. Regs. 103-833, CCEBA by and through its undersigned counsel, hereby submits this First Set of Interrogatories to London Economics International, LLC ("LEI"). Pursuant to South Carolina Rule of Civil Procedure 26(e) and Commission regulations, each request is continuing until the time of the hearing such that LEI must promptly transmit to the Department the requested information as it becomes available.

INSTRUCTIONS

1. Responses to these requests should be provided to the undersigned, via email, within nine (9) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.

4. If the requested information is found in other places or in other exhibits, references shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.

5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.

6. Each request should be reproduced at the beginning of the response thereto.

7. This request shall be deemed continuing so as to require LEI to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

8. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

9. Answer each request on the basis of the entire knowledge of LEI, including information in the possession of LEI or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

10. If any request cannot be answered in full, respond to the extent possible and specify the reasons for LEI's inability to respond.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," and "LEI" mean LEI or any of its affiliates, officers, directors, employees, attorneys, or agents.
2. "Application" is defined as the application filed by Dominion Energy South Carolina, Inc. on April 22, 2021 or as otherwise revised.
3. "DESC" is defined as Dominion Energy South Carolina, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
4. "Fairfield" refers to the Fairfield Pumped Storage hydroelectric facility in Jenkinsville, SC.
5. "LEI Report" refers to the Independent Report on Dominion Energy South Carolina, Inc.'s 2021 Avoided Cost Proceeding (Docket No. 2021-88-E) prepared for the Public Service Commission of South Carolina and filed on September 16, 2021.
6. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams,

drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audiotapes, and videotapes. The terms include drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

7. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

8. When used in referenced to a document, "identify," identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no long is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

INTERROGATORIES

In responding to each of the below Interrogatories, please refer to page 51 of the LEI report which, in addressing operating reserve requirements, states “DESC witness Mr. Bell recognizes that “[w]hile it is true that Guidehouse identified additional operating reserves higher than DESC has historically used, the study establishes that additional reserves are needed due to the intermittent nature of solar energy generation and the increasing levels of solar penetration into the DESC system.”” The Report cites to the *Rebuttal Testimony of Eric H. Bell on behalf of Dominion Energy South Carolina, Inc.*, p. 3.

1. Does LEI agree with ORS Witness Horii’s testimony concluding that “Guidehouse has not justified their forecast of incremental operating reserves needed to accommodate solar forecast uncertainty?” Horii Direct at p. 8, lines 15 – 17.

RESPONSE:

2. Has LEI reviewed all the workpapers supporting Section 4 of the Guidehouse study, titled “Demonstrating the Need for Additional Reserves,” including workpapers provided in response to CCEBA Interrogatory 2-14?

RESPONSE:

3. Has LEI reviewed the workpaper entitled and produced as “CCEBA Discovery Request 2-14 973 noInc Reserves.xlsx” which reflects Guidehouse’s simulation of DESC’s system without any additional operating reserves?

RESPONSE:

4. Within “CCEBA Discovery Request 2-14 973 noInc Reserves.xlsx” has LEI reviewed the formulas contained within the “Hourly Summary” tab, Column G, which is labeled “Risk of Solar Shortfall”?

RESPONSE:

5. Does LEI agree that this formula calculates the risk of a simultaneous 60% drop in solar production across all of DESC’s solar facilities? If so, does LEI believe a 60% drop in solar production across all of DESC’s solar facilities is a realistic assumption?

RESPONSE:

6. Does LEI believe the formula in column G accurately represents the geographic diversity of variability in solar production?

RESPONSE:

7. Does LEI believe the Guidehouse study demonstrates that a 60% potential drop in solar production should be assumed rather than DESC’s current operating practice of 40%?

RESPONSE:

8. Has LEI reviewed Mr. Burgess' workpaper labeled "CCEBA Discovery Request 2-14 973 noInc Reserves EB.xlsx", which is a modified version of the Guidehouse workpaper that replaces the 60% value with a 40% value?

RESPONSE:

9. Does LEI have any reason to disagree with Mr. Burgess's analysis in the above workpaper that when the 40% value is modeled, there is no occurrence of a Reserve Shortfall in any hour prior to 2029? (note that the original Guidehouse workbooks contained formula errors for years 2029 and later, which Mr. David acknowledged, so these years should be excluded from evaluation).

RESPONSE:

10. Has LEI reviewed or analyzed the workpapers produced by DESC in response to CCEBA Interrogatory 1-4, which provide historical operating reserves on DESC's system, to determine whether the current level of reserves DESC normally carries has been insufficient to accommodate solar variability for Tranche 1?

RESPONSE:

For the following Interrogatories, please refer to the LEI Report at page 56. On that page, LEI states: **“However, if the Commission believes that it must set a fixed VIC as part of this proceeding, LEI concurs with Mr. Horii that DESC’s proposed VIC for Tranche 1 of \$1.80/MWh may be a reasonable value.”**

11. Does LEI agree that Mr. Horii’s primary rationale for making this recommendation was the fact that a separate utility, Duke Energy Progress, has an integration charge that is “in the same ball park” as the Tranche 1 VIC calculated by DESC?

RESPONSE:

12. Did LEI review Mr. Burgess’ workpapers labeled “Guidehouse VIC Calculation Workbook 341-973 MW 06.07.21 – EB” and “Guidehouse VIC Calculation Workbook 974-1073 MW 06.07.21 – EB” ?

RESPONSE:

13. Does LEI agree that Mr. Burgess’ workpapers rely upon the same methodology of the completed Guidehouse VIC study except for limited modifications to the final VIC calculation, such as weighting based on hourly solar production?

RESPONSE:

14. Does LEI have any reason to believe that Mr. Horii reviewed Mr. Burgess' workpapers prior to Mr. Horii making his recommendation?

RESPONSE:

15. Does LEI believe the hourly weighting approach used in Mr. Burgess' workpapers is more or less accurate than the constant weighting approach Guidehouse's original workpapers used?

RESPONSE:

16. Does LEI agree that the application of an hourly weighting approach would yield a VIC lower than \$1.80? If so, what is that value? If not, why not?

RESPONSE:

Respectfully Submitted,

/s/Richard L. Whitt
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Both as Counsel for Intervenor, Carolinas Clean Energy Business Association.

September 22, 2021